



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

In the Matter of the Application of San Diego Gas & Electric Company (U 902 G) and Southern California Gas Company (U 904 G) for Authority to Integrate Their gas Transmission Rates, Establish Firm Access rights, and Provide Off-System Gas Transportation Services.

A. 04-12-004

**REPLY COMMENTS OF**  
**SOUTHERN CALIFORNIA EDISON COMPANY (U338-E)**

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Dated: **November 27, 2006**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
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In the Matter of the Application of San Diego Gas	)	
& Electric Company (U 902 G) and Southern	)	A. 04-12-004
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to Integrate Their Gas Transmission Rates,	)	
Establish Firm Access rights, and Provide Off-	)	
system Gas Transportation Services.	)	

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**REPLY COMMENTS OF**  
**SOUTHERN CALIFORNIA EDISON COMPANY (U338-E)**

Pursuant to Rule 77.5 of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, Southern California Edison Company (“SCE”) submits these reply comments to the Proposed Decision (“PD”) and Alternate Proposed Decision (“APD”) in the above-referenced proceeding.

**I.**

**THE COMMISSION SHOULD ADOPT A SYSTEM OF FIRM ACCESS RIGHTS**

SCE urges the Commission to adopt a system of firm access rights (“FAR”) as set forth in the PD and APD. The Commission has long-supported the adoption of a system of FAR for Southern California Gas Company/San Diego Gas and Electric Company (“SoCalGas/SDG&E”), commencing almost ten years ago with the “Most Promising Options” decision (D. 99-07-015) in R. 98-01-011.

Opponents of FAR, such as Coral Energy Resources (“Coral”) and others, make incorrect factual assertions regarding the record. Coral, for example, starts off by stating that the applicants failed to meet their burden of proof that there is a need for market reform.<sup>1</sup> Such assertion ignores the fact that the Commission, in prior decisions and proceedings, already determined that there should be a system of FAR and that the applicants were directed to file an

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<sup>1</sup> Coral’s Opening Comments, p. 2.

application to implement FAR. Corral and others further state that a system of FAR is not necessary and that the PD failed to consider the impact that a system of firm rights would have on the functioning of the southern California market.<sup>2</sup> Again, they are mistaken. The PD states, for example, “With the FAR system, we can expect gas markets to develop at the citygate, as well as at the border. The FAR system will provide gas shippers, and end users with new options and opportunities.”<sup>3</sup>

In addition, concerns expressed by the opponents to FAR are also mitigated by the record evidence. For example, Coral and others’ concern that there will no longer be as common reference point and that customers will lose flexibility<sup>4</sup> is mitigated by the evidence presented by Dr. Alexander that the creation of a citygate market would create a stronger market place than at the various border locations.<sup>5</sup> Coral’s additional concern that the FAR would result in a more complicated allocation price<sup>6</sup> is mitigated by the record evidence presented by Dr. Alexander that FAR will simplify the *overall* process of shipping gas, which is unnecessarily complex due to denial of access.<sup>7</sup> Finally, Coral’s concerns over “add-ons” to the application is a red herring,<sup>8</sup> given that these “add-ons” were fully vetted at the evidentiary hearings, as demonstrated through the cross-examination of Coral’s own counsel and others.

Finally, Coral may claim that firm rights are not necessary, but it then contradicts itself and states that alternate rights “are interruptible in nature, however, and accordingly are inferior to firm access rights at a particular point.”<sup>9</sup> SCE agrees that interruptible rights are inferior which is why SCE supports a system of FAR. SCGC’s asserts that the current system is “highly

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<sup>2</sup> Coral’s Opening Comments, pp. 1-2; SCGC’s Opening Comments, pp. 8-9.

<sup>3</sup> PD, p. 3.

<sup>4</sup> Coral’s Opening Comments, pp. 8-11.

<sup>5</sup> Tr., Vol. 15, p. 2363 (SCE, Dr. Alexander) (August 22, 2006).

<sup>6</sup> Coral’s Opening Comments, pp. 11-12.

<sup>7</sup> Tr., Vol. 15, p. 2369 (SCE, Dr. Alexander) (August 22, 2006).

<sup>8</sup> Coral’s Opening Comments, p. 3.

<sup>9</sup> Coral’s Opening Comments, p. 11.

reliable”<sup>10</sup> but this is not the same as having firm access rights. Indeed, firm access rights are superior and should be adopted by the Commission.

## II.

### **THE COMMISSION SHOULD ALLOW SET-ASIDE FOR ELECTRIC GENERATION CUSTOMERS WITH LONG TERM CONTRACTS WITH UPSTREAM PIPELINE CONTRACTS**

Both the PD and APD recognize the public interest need to provide a set-aside capacity to electric generation (“EG”) customers of SDG&E and SoCalGas who have long-term contract commitments on the upstream pipelines.<sup>11</sup> The recent electric energy crisis is an important reminder to all of the need to ensure that electric generation customers have the gas they need to generate electricity and maintain system reliability. Indeed, SCE considers the need for a Step 1 set-aside for EG customers to be analogous to the need for set-aside for wholesale or core customers, who must serve residential customers. With respect to core customers, one must remember that gas is needed to heat core customers’ heating system, but it is electricity that is typically used to work the fans to blow the heat out into the house.

Contrary to the assertion by opponents to the EG set-aside who claim that the set-aside is discriminatory among noncore customers<sup>12</sup> or not necessary,<sup>13</sup> the PD recognizes that EG customers serve a different public interest than other noncore customers and therefore the set-aside for EG customers is appropriate.<sup>14</sup> Non-EG customers, such as Watson Cogeneration and other generators associated with the California Cogeneration Council (“CCC”),<sup>15</sup> produce electricity as a byproduct of an industrial process, and are therefore different because EG customers are actually operating the electric grid. While SoCalGas/SDG&E is correct that EG

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<sup>10</sup> SCGC’s Opening Comments, p. 2.

<sup>11</sup> PD, mimeo, p. 92. APD, mimeo p. 92.

<sup>12</sup> See e.g., SoCalGas/SDG&E’s Opening Comments, p. 6.

<sup>13</sup> CMTA argues that the Step 1 set-aside for EG customers is not necessary because the Step 2 allocation process is adequate. CMTA’s Opening Comments, pp. 5-7.

<sup>14</sup> PD, mimeo, p. 92; APD, mimeo, p. 92.

<sup>15</sup> See Watson Cogeneration and CCC’s Opening Comments, which addresses the set-aside for EG customers.

customers have other options,<sup>16</sup> this is also true for core and wholesale customers. All three serve the same public need. All three ultimately serve core customers and there is no reason to single out EG customers and deny them a Step 1 set-aside. While SoCalGas/SDG&E's view that EG set-asides should be for Commission approved contracts has some logic,<sup>17</sup> it is not practical to adopt since many EG customers (e.g., municipalities) are not regulated by the Commission. SCE, however, would agree with SoCalGas/SDG&E that the set-asides should be on the same terms as core and wholesale customers, namely that the EG set aside be limited to those firm upstream contracts that extend more than 18 months into the 36 month cycle.<sup>18</sup>

### III.

#### **THE COMMISSION SHOULD RETAIN THE AUTHORITY TO REVIEW WHETHER EXPANSIONS SHOULD BE ON A INCREMENTAL OR DISPLACEMENT BASIS.**

Some parties<sup>19</sup> have argued that the PD errs in finding that the Commission should retain the authority to review whether expansions should be done on an incremental or displacement basis.<sup>20</sup> However, as stated by SCE witness Dr. Alexander<sup>21</sup> and CMTA witness Mr. Beach,<sup>22</sup> expansions on a displacement basis could, in some situations, result in higher priced gas displacing lower priced gas, thus causing a rise in the total cost of gas to California.

### IV.

#### **PROVISION OF PIPELINE DATA SHOULD MIRROR THAT OF FERC**

Both the PD and APD would require SoCalGas and SDG&E to provide certain flow models or other sensitive pipeline data under a protective order.<sup>23</sup> In trying to understand the operations and constraints on the SoCalGas/SDG&E system, SCE has had discovery disputes

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<sup>16</sup> SoCalGas/SDG&E's Opening Comments, p. 6..

<sup>17</sup> SoCalGas/SDG&E's Opening Comments, p. 6.

<sup>18</sup> SoCalGas/SDG&E's Opening Comments, p. 7.

<sup>19</sup> Woodside Natural Gas' Opening Comments, p. 4; SES Terminal's Opening Comments, p. 3.

<sup>20</sup> PD, mimeo, p. 71.

<sup>21</sup> Tr., Vol. 15, pp. 2318 - 2319 (SCE, Dr. Alexander) (August 22, 2006).

<sup>22</sup> Tr., Vol. 10, pp.1493-1496 (CMTA/Indicated Producers, Watson Cogen, Mr. Beach).

<sup>23</sup> AD, mimeo, p. 72; APD, APD, mimeo p. 72.

with SoCalGas/SDG&E over obtaining this type of information. SCE believes that much of the information that SoCalGas/SDG&E seeks to protect is provided by interstate pipelines regulated by FERC. As such, the PD and APD's provision of such information, which would be protected under a protective order, is reasonable.

V.

**CONCLUSION**

Wherefore, for the above reasons, SCE requests that the Commission adopt the system of FAR and retain the Step 1 set-aside as set out in both the PD and APD.

Respectfully submitted,

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November 27, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of REPLY COMMENTS OF SOUTHERN SOUTHERN CALIFORNIA EDISON COMPANY (U338-E) on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this 27th day of November, 2006, at Rosemead, California.

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A.04-12-004

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**A.04-12-004**

Monday, November 27, 2006

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Monday, November 27, 2006

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